

**REMARKS**

**I. Formalities**

Applicant thanks the Examiner for indicating that the Formal Drawings filed on July 18, 2005 are accepted.

**II. Status of the Application**

By the present amendment, Applicants amend claim 1. Claims 1 and 3-8 are all the claims pending in the Application, with claims 1 and 6 being in independent form. Claims 1 and 3-8 have been rejected.

The present amendment addresses each point of objection and rejection raised by the Examiner. Favorable reconsideration is respectfully requested.

**III. Objections to the Specification**

The Examiner has objected to the specification, alleging that the specification does not discuss or explain the meaning of the term “a keystone vector.” More particularly, in response to the arguments Applicant advanced in the Amendment filed on July 18, 2005, that one of ordinary skill would understand that the term “a keystone vector,” refers to a vector that represents a distorted angle of a projected image, the Examiner alleges that Applicant has defined “a keystone vector” as “a distorted angle of a projected image” (emphasis added). (09/28/05 Office Action, page 4). Further, the Examiner alleges that vectors have both a magnitude and a direction and that, therefore, an angle is not a vector in a conventional sense. As such, the Examiner indicates that if the Applicant meant to define a keystone vector as something which is an angle and not a

vector, it is unclear why such a definition is not explicitly included in the specification.

Applicant respectfully traverses the Examiner's rejection for *at least* the reasons set forth below.

Applicant agrees with the Examiner that vectors have both a magnitude and a direction. Accordingly, Applicant submits that one of ordinary skill in the art would recognize from the present specification that the term "a keystone vector," as used consistently therein, includes both a magnitude and a direction. More particularly, one of ordinary skill in the art would understand that the term "a keystone vector," as used in the present application, represents a magnitude of distortion of a projected image in addition to a distorted angle of a projected image.

What is more, Applicant's remark in the Amendment under 37 C.F.R. § 1.111 filed on July 18, 2005 that the term "a keystone vector," as used in claims 2 and 5, refers to a vector that represents a distorted angle of a projected image is not contrary to the conventional interpretation of the term "vector." Indeed, Applicant vehemently disagrees with the suggestion in the grounds of rejection that Applicant has defined "a keystone vector" as "a distorted angle of a projected image." To the contrary, in making the aforementioned remark, Applicant was merely pointing out that the term "a keystone vector" refers to a vector that represents a distorted angle of a projected image, and did not intend to suggest that the term "a keystone vector" did not also represent a magnitude as well. Thus, Applicant did not intend to define "a keystone vector" as something which is an angle and not a vector, rather, Applicant has merely used the term "a keystone vector," consistent with its ordinary meaning.

As such, Applicant submits that one of ordinary skill would understand that the term "a keystone vector," as used in the present specification refers to a vector that represents a distorted

angle of a projected image, as well as a magnitude of distortion of a projected image, and submits that such usage is consistent with the ordinary and accepted meaning of the term “vector.” As a result, Applicant respectfully requests that the Examiner withdraw this rejection.

**IV. Claim Rejections under 35 U.S.C. § 112**

The Examiner has rejected claims 1 and 3-8 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. In particular, the Examiner indicates that the term “a keystone vector,” is still not clearly defined. Applicant respectfully traverses these rejections for *at least* the reasons already discussed above with respect to the meaning of the term “a keystone vector.” Specifically, Applicant submits that the term “a keystone vector,” as used in the present specification refers to a vector that represents a distorted angle of a projected image, as well as a magnitude of distortion of a projected image, and submits that such usage is consistent with the ordinary and accepted meaning of the term “vector.” Accordingly, Applicant respectfully requests that the Examiner withdraw these rejections.

**V. Claim Rejections under 35 U.S.C. § 102**

The Examiner has rejected claims 1 and 3-8 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,419,365 to Potekev. Applicant respectfully traverses these rejections for *at least* the reasons set forth below.

According to the MPEP, “a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art

reference.” (MPEP § 2131). Applicant respectfully submits that claims 1 and 3-8 positively recite recitations which are not disclosed (or suggested) by Potekev.

**A. Independent Claim 1**

First, the grounds of rejection allege that the term “a keystone vector” is still undefined. Applicant respectfully disagrees with the grounds of rejection in this regard for *at least* the reasons discussed above with respect to the meaning of the term “a keystone vector.” As already discussed, Applicant submits that the term “a keystone vector,” as used in the present specification refers to a vector that represents a distorted angle of a projected image, as well as a magnitude of distortion of a projected image, and submits that such usage is consistent with the ordinary and accepted meaning of the term “vector.”

Second, the Examiner acknowledges that the cited Potekev reference does not explicitly disclose a particular proportional relationship between the reduction and the angle of incident light  $\theta$  but, nevertheless, that there is some proportional relationship between the reduction and the angle  $\theta$ . The Examiner also alleges that Applicant does not recite in the claim the specific ratio / proportion of the reduction to the incident angle  $\theta$ . Applicant respectfully disagrees with the grounds of rejection.

Contrary to the allegations in the grounds of rejection, claim 1 does, in fact, recite the specific ratio / proportion of the reduction to the incident angle  $\theta$ . More particularly, claim 1 explicitly recites that “the light integrator reduces the shape of the cross-sectional face of the light... in proportion to cos  $\theta$  with respect to the original shape of the cross-sectional face of the light in the direction of a keystone vector formed on the image-forming panel, when the incident

angle of the light incident onto the image-forming panel is  $\theta'$  (emphasis added). Indeed, a particular example of an illustrative implementation of this specific proportion is provided in the present specification at paragraph 39. As described in the present specification with respect to exemplary embodiments of the present invention, the width of the cross-sectional face of light (in the direction of the keystone vector) is multiplied by the value of  $\cos \theta$  (which will always be less than or equal to 1).

Third, the Examiner alleges that the cited Potekev reference does reduce the shape of the cross-sectional face of the light incident from a light source and radiated onto an image-forming panel in proportion to  $\cos \theta$ , as recited in claim 1. More particularly, the Examiner alleges that if Potekev did not reduce the shape of the cross-sectional face of the light, as recited in claim 1, then the illuminating panel would result as shown in Figure 4 of Potekev (i.e., a depiction of the illumination across the surface of a DMD when illuminated by a prior art light integrating tunnel which does not compensate for any Keystone distortion). (See column 5, lines 24-39).

The Examiner's position in this regard appears to be based upon a theory of inherency, namely, that Potekev inherently discloses the feature of reducing the shape of the cross-sectional face of the light in proportion to  $\cos \theta$ , as recited in claim 1. However, in relying upon the theory of inherency, the Examiner must provide a basis in fact and/or technical reasoning to reasonably support the determination that the allegedly inherent characteristic necessarily flows from the teachings of the applied prior art. (MPEP § 2112). Indeed, the fact that a certain result or characteristic may occur or be present in the prior art is not sufficient to establish the

inherency of that result or characteristic. (*See In re Rijckaert*, 9 F.3d 1531, 1534, 28 USPQ2d 1955, 1957 (Fed. Cir. 1993)).

However, Applicant submits that Potekev does not necessarily require that the shape of the cross-sectional face of the light is reduced in proportion to  $\cos \theta$ , as recited in claim 1. To the contrary, Potekev merely discloses that “the image of nonrectangular output aperture 94 on DMD 50 is intentionally distorted to compensate for any Keystone distortion.” (Column 5, lines 59-61). However, the mere fact that a certain result or characteristic may occur or be present in the prior art is not sufficient to establish the inherency of that result or characteristic. Thus, since Potekev may compensate for Keystone distortion in other ways, besides reducing the cross-sectional face of the light in proportion to  $\cos \theta$ , as recited in claim 1, Applicant submits that this feature is not inherently disclosed by Potekev.

Therefore, Applicant respectfully submits that independent claim 1 is not anticipated by (i.e. is not readable on) the applied reference for *at least* these independent reasons. Further, Applicant respectfully submits that the dependent claims 3-5 are allowable *at least* by virtue of their dependency on claim 1. Hence, Applicant respectfully requests that the Examiner withdraw these rejections.

**B. Independent Claim 6**

In view of the similarity between the requirements of claim 6 and the requirements discussed above with respect to independent claim 1, Applicant respectfully submits that arguments analogous to the foregoing arguments as to the patentability of independent claim 1 demonstrate the patentability of claim 6. As such, it is respectfully submitted that claim 6 is

patentably distinguishable over the cited Potekev reference *at least* for reasons analogous to those presented above. Thus, the allowance of this claim is respectfully solicited of the Examiner.

**VI. Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

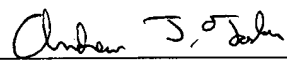
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**23373**

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